

**RECEIVED
CENTRAL FAX CENTER****OCT 24 2006****Remark**

Applicants respectfully request reconsideration of this application as amended. Claims 1, 5, 15 and 23 have been amended. No Claims have been canceled. Therefore, claims 1-26 are now presented for examination. The claim amendments above are made in order to correct some errors in grammar and antecedent basis. No new issues are raised.

35 U.S.C. §102 Rejection*Sicher*

The Examiner has rejected claims 1-26 under 35 U.S.C. §102 (e) as being anticipated by Sicher, et al., U.S. Patent Publication No. 2001/0015968 ("Sicher"). Sicher shows a system for interfacing cellular telephones to Voice over IP Internet telephones. Most of the disclosure has to do with converting voice signals from one kind of encoding to another kind of encoding. The Examiner has pointed to paragraphs 16, 17, 29-34, and 39-42.

Sicher paragraphs 29-34 describe Figures 1 and 2 of the reference. There is in Figure 1, a conventional mobile station, radio base station, and mobile switching center. The MSC is coupled to an E-IWF. The E-IWF is coupled through the internet to an Internet terminal. There is almost no explicit description of any of this equipment. Sicher would appear to leave that description to the state of the art at the time. Figure 2 is a protocol stack. It shows relationships between protocols and encoding schemes.

Referring to Claim 1, Applicants do not see a central telephone switch trunk together with a wireless trunk. Applicants do not see subscriber line interface cards, nor a control section coupled to each subscriber line interface card. Applicants do not see

subscriber interface modules being used to coordinate and control over the air protocols. Finally there is no suggestion of the last element of Claim 1 in which calls are routed to the wireless network in response to a command from a central telephone switch. This last element is also a part of Claims 12, 19, and 23.

Paragraphs 39-42 relate to steps c and d of Figure 3, a process diagram. These paragraphs have a lot to say about codecs and other standards and very little to say about routing calls or any type of hardware. Paragraph 41 mentions Network Access Servers and routers providing routing functions but says nothing about their operation or how they function. There is no mention of commands, nor of a central telephone switch.

Paragraphs 16 and 17 are in the summary of the invention. Paragraph 16 refers to encoding voice from a mobile station and transmitting it to the cellular base station. From there it is sent to an E-IWF, converted to VoIP SDUs and sent to an ISP. Paragraph 17, refers to cellular fax protocols. The fax protocols are used by the mobile station to transmit an image. Instead of converting the voice to another type of encoding, the fax data stream is converted into UDP frames to be sent through a fax gateway that then converts the UDP frames into fax modem voiceband information. Again there is no mention of the hardware recited in Claims 1 and 23 nor of the command recited in all of the claims.

Applicants are unable to find any of the teachings referred to by the Examiner in the cited reference. Accordingly, without more, the Examiner has failed to show anticipation by the reference and the claims are therefore allowable. The dependent claims are not discussed above, but are believed to be allowable on the same grounds as the independent claims, as well as for the additional limitations explicitly set forth in each claim, respectively.

RECEIVED
CENTRAL FAX CENTER

OCT 24 2006

Conclusion

Applicants respectfully submit that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicants respectfully request the rejections be withdrawn and the claims as amended be allowed.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Request for an Extension of Time

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.


Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: October 24, 2006



Gordon R. Lindeen III
Reg. No. 33,192

12400 Wilshire Boulevard
7th Floor
Los Angeles, California 90025-1030
(303) 740-1980